

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**CELLULAR COMMUNICATIONS  
EQUIPMENT LLC,**

**Plaintiff,**

**v.**

**HMD GLOBAL OY,**

**Defendant.**

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**Case No. 2:20-CV-0078-JRG**

**JURY TRIAL DEMANDED**

**DECLARATION OF HUNTER S. PALMER**

I, Hunter S. Palmer, hereby declare as follows:

1. I am an attorney at the law firm of Bragalone Conroy PC in Dallas, Texas. I am counsel of record for CCE in the above-referenced matter. I am admitted to practice in the State of Texas and the Eastern District of Texas. I submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could and would competently testify to the truth of each statement herein.

2. Exhibit A to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 12, 2020 letter from ARC HMD.

3. Exhibit B to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 16, 2020 letter from ARC and CCE to HMD.

4. Exhibit C to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 16, 2020 email from ARC to HMD.

5. Exhibit D to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 23, 2020 letter from ARC and CCE to HMD.

6. Exhibit E to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 16, 2020 letter from HMD to ARC.

7. Exhibit F to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 20, 2020 letter from CCE to HMD.

8. Exhibit G to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 22, 2020 letter from HMD to ARC and CCE.

9. Exhibit H to CCE's Motion to Enforce the Protective Orders is a true and correct copy of a November 23, 2020 letter from ARC and CCE to HMD.

10. HMD provided a draft joint stipulation, including exhibits thereto, to ARC for filing in a Central District of California court. In addition to discussion [REDACTED]  
[REDACTED] the draft joint stipulation includes the following as proposed exhibits.

- HMD's September 21, 2020 Motion to Dismiss (Dkt. No. 36, filed under seal in this Action), designated as an attachment to the proposed joint stipulation.
- CCE's Response in Opposition to HMD's Motion to Dismiss (Dkt. No. 47, filed under seal in this Action), designated as an attachment to the proposed joint stipulation.
- HMD's Reply to the Motion to Dismiss (Dkt. No. 49, filed under seal in this Action), designated as an attachment to the proposed joint stipulation.
- CCE's Sur-Reply in Opposition to the Motion to Dismiss (Dkt. No. 58, filed under seal in this Action), designated as an attachment to the proposed joint stipulation.
- A Letter of November 3, 2020 from counsel of HMD to counsel of CCE, designated "HIGHLY CONFIDENTIAL—OUTSIDE ATTORNEYS' EYES ONLY."

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designated as an attachment to the proposed joint stipulation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2020

/s/ Hunter S. Palmer  
Hunter S. Palmer